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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

18 BROTHERHOOD MUTUAL  
19 INSURANCE COMPANY, as Subrogee  
of GRACE COMMUNITY CHURCH OF  
RENO

| Case No.: 3:24-CV-00037-CSD

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
PROPOSED JOINT PRETRIAL  
ORDER**

**(FIRST REQUEST)**

21 v.

V.

22 ASPEN PUMPS; and DOE  
23 DEFENDANTS 1-10,

### Defendants.

1 IT IS HEREBY STIPULATED AND AGREED between Plaintiff Brotherhood  
2 Mutual Insurance Company (“Brotherhood” or “Plaintiff”) and Defendant Aspen Pumps,  
3 Inc. (“Aspen Pumps” or “Defendant”) (collectively the “Parties”), by and through their  
4 counsel of record, pursuant to LR 7-1, LR IA 6-1, and LR IA 6-2, that the parties shall have  
5 addition time to draft and file the Proposed Joint Pretrial Order (“JPTO”) up to and  
6 including July 21, 2025.

7 On May 20, 2025, the Court entered its Order Denying Plaintiffs’ Motion in Limine  
8 to Exclude Defendant’s Experts as well as Plaintiff’s Motion for Summary Judgment and  
9 granting in part Defendant’s Cross-Motion for Summary Judgment [Dkt. 1]. Pursuant to LR  
10 26-1, the Court’s May 20, 2025 Order triggered the parties’ current deadline to file their  
11 JPTO—June 20, 2025.

12 Over the last month, the parties have been conferring and working towards the  
13 finalization of the JPTO. However, the parties are in need of additional time to finalize their  
14 respective exhibit lists, ensure that exhibit lists are not duplicative, and to confer regarding  
15 objections to their respective exhibits. Further, the parties are still working to finalize their  
16 deposition designations and objections thereto.

17 Accordingly, the parties now respectfully propose to extend the filing of the JPTO  
18 by approximately one month, up to and including July 21, 2025. Good cause exists for the  
19 extension set forth herein. This is the first request for an extension of this deadline and is  
20 not intended to cause any delay.

21 This stipulation is submitted for the limited purpose of extending the above deadline  
22 and is without prejudice to any parties’ rights, especially given that there is no trial date  
23 currently set in this matter.

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1 IT IS SO STIPULATED  
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DATED: June 18, 2025

5 **LAXALT LAW GROUP**

6 By: /s/ Roger O'Donnell

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By: /s/ Sammantha J. Tillotson

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## ORDER

This Court, having reviewed and considered the Stipulation by the parties, and Good Cause Appearing therefore, the deadline for the Proposed Joint Pretrial Order is hereby extended as agreed to by the parties to July 21, 2025.

## **IT IS SO ORDERED.**

DATED this 20th day of June, 2025.

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**UNITED STATES MAGISTRATE JUDGE**

**BAKER & HOSTETTER LLP**  
DENVER  
**HOWARD & HOWARD**  
LAS VEGAS

**PROOF OF SERVICE**

I hereby certify that I am an employee of Baker & Hostetler LLP, and that on the 18<sup>th</sup> day of June, 2025, I caused to be served a true and correct copy of the foregoing in the following manner:

(U.S. MAIL) Pursuant to Fed. R. Civ. P. 5(b)(2)(C), the above-referenced document was mailed in a first class, postage-paid envelope to the following:

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